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9 UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
10

11 UNITED STATES OF AMERICA,)
12 Plaintiff,) CASE NO. 2:17-CR-000316-RFB-CWH
13 vs.)
14 SERGIO BARAJAS,)
15 Defendant,)
16

17 **STIPULATION AND ORDER TO ALLOW DEFENDANT BARAJAS**
18 **TO OBTAIN A PASSPORT AND TRAVEL TO MEXICO**

19 IT IS HEREBY STIPULATED and AGREED by and between the United States of America,
20 by and through NICHOLAS TRUTANICH, United States Attorney, and DANIEL SCHIESS,
21 Assistant United States Attorney, and Defendant SERGIO BARAJAS, by and through his counsel,
22 RUSSELL E. MARSH, ESQUIRE, and MONTI JORDANA LEVY, that the conditions of Mr.
23 Barajas's Pretrial Release be modified to allow him to obtain his passport and travel to Mexico for
24 up to 10 days in July 2019.

25 1. On October 4, 2017, Mr. Barajas appeared pursuant to a Summons, and was released
26 on a PR Bond (ECF No.32). Mr. Barajas was ordered to surrender his passport and his travel was
27 restricted to the continental U.S. (ECF No. 42 at 3).

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1 2, Mr. Barajas's trial in this matter is currently set for December 2, 2019. (ECF No.
2 111).

3 3. Mr. Barajas requests to travel to Mexico in July 2019 to celebrate his birthday with
4 friends and family. He will need to retrieve his passport to travel out of the country.

5 4. The parties agree that the conditions of Mr. Barajas pretrial release be modified to
6 allow him to travel to Mexico. This travel will take place between July 10-20, 2019. Mr. Barajas
7 requests access to his passport for those dates. He will return the passport to U.S. Pretrial Services
8 when he returns to the United States.

9 5. Pretrial Services agrees with these changes in Mr. Barajas' conditions of release. Mr.
10 Barajas's Pretrial Services Officer is Camron Pitcher who is in California. Mr. Barajas and counsel
11 have contacted Officer Pitcher, and he agrees with this request.

12 6. The parties agree that all other conditions of Mr. Barajas's release will remain in full
13 force and effect.

14 Dated this 3rd day of July, 2019.

15
16 WRIGHT MARSH & LEVY

Respectfully submitted,

NICHOLAS TRUTANICH
UNITED STATES ATTORNEY

17
18 BY /s/ Russell E. Marsh
19 RUSSELL E. MARSH, ESQUIRE
20 MONTI JORDANA LEVY, ESQUIRE
21 Attorney for Defendant Sergio Barajas

BY /s/ Daniel R. Schiess
DANIEL R. SCHIESS
Assistant U.S. Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,)
4 Plaintiff,)
5 vs.)
6 SERGIO BARAJAS,)
7 Defendant,)
8 _____)

CASE NO. 2:17-CR-000316-RFB-CWH

9
10 **ORDER**

11 Based on the Stipulation between Defendant Sergio Barajas and the Government, through
12 counsel, and good cause appearing,

13 **IT IS HEREBY ORDERED** that the conditions of Defendant Barajas’s pretrial release be
14 modified as follows:

- 15 1. Mr. Barajas may travel to Mexico for up to ten days between July 10-20, 2019.
- 16 2. Mr. Barajas will obtain his passport from U.S. Pretrial Services, who will provide the
17 passport to him for the purpose of this travel. Mr. Barajas will return his passport to
18 Pretrial Services when he is back in the United States.
- 19 3. All other conditions of Pretrial Supervision remain in effect.

20 IT IS SO ORDERED.

21 Dated: July 3, 2019 .

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24 RICHARD F. BOULWARE, II
25 UNITED STATES DISTRICT JUDGE
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